

JUDGE MARSHALL

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**DOCKETED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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DISTRICT COURT

THE MAGNAVOX COMPANY,  
a Corporation, and  
SANDERS ASSOCIATES, INC.,  
a Corporation,

Plaintiffs,

v.

SEEBURG INDUSTRIES, INC.,  
a Corporation, THE SEEBURG  
CORPORATION OF DELAWARE,  
a Corporation, WILLIAMS  
ELECTRONICS, INC., a  
Corporation, and WORLD WIDE  
DISTRIBUTORS, INC.,  
a Corporation,

Defendants.

Civil Action  
No.

74C 2510

COMPLAINT FOR PATENT INFRINGEMENT

1. This action arises under the patent laws of the United States, Title 35, United States Code. Jurisdiction of this Court is based on Title 28, United States Code, Section 1338(a).

2. Plaintiff The Magnavox Company is a corporation organized and existing under the laws of the State of Delaware.

3. Plaintiff Sanders Associates, Inc. is a corporation organized and existing under the laws of the State of Delaware.

4. Defendant Seeburg Industries, Inc. is a corporation organized and existing under the laws of the

State of Delaware.

5. Defendant The Seeburg Corporation of Delaware is a corporation organized and existing under the laws of the State of Delaware.

6. Defendant Williams Electronics, Inc. is a corporation organized and existing under the laws of the State of Delaware.

7. Defendant World Wide Distributors, Inc. is a corporation organized and existing under the laws of the State of Illinois.

8. On April 25, 1972, United States Letters Patent 3,659,284 issued to plaintiff Sanders Associates, Inc. as assignee of William T. Rusch for an invention in TELEVISION GAMING APPARATUS and since that date plaintiff Sanders Associates, Inc. has been and still is the owner of said Letters Patent.

9. On April 25, 1972, United States Letters Patent 3,659,285 issued to plaintiff Sanders Associates, Inc. as assignee of Ralph H. Baer, William T. Rusch, and William L. Harrison for an invention in TELEVISION GAMING APPARATUS AND METHOD and since that date plaintiff Sanders Associates, Inc. has been and still is the owner of said Letters Patent.

10. By an agreement entered into between plaintiff Sanders Associates, Inc. and plaintiff The Magnavox Company effective January 27, 1972, plaintiff The Magnavox Company

has been and still is the exclusive licensee under said United States Letters Patent 3,659,284 and 3,659,285 with the right to bring actions for any infringement of said Letters Patent.

11. Defendants Seeburg Industries, Inc., The Seeburg Corporation of Delaware, and Williams Electronics, Inc. have been for a long time past and still are jointly infringing said Letters Patent 3,659,284 and 3,659,285 by making, using and/or selling gaming apparatus embodying the subject matter of the claims of said Letters Patent and will continue to do so unless enjoined by this Court.

12. Defendant World Wide Distributors, Inc., both separately and independently and jointly with defendants Seeburg Industries, Inc., The Seeburg Corporation of Delaware, Williams Electronics, Inc., and others, has been for a long time past and still is infringing said Letters Patent 3,659,284 and 3,659,285 by making, using and/or selling gaming apparatus embodying the subject matter of the claims of said Letters Patent and will continue to do so unless enjoined by this Court.

13. Each of defendants' infringements of said Letters Patent 3,659,284 and 3,659,285 were and are willful and with full knowledge of said Letters Patent.

14. Plaintiffs have placed the notice prescribed at Title 35, United States Code, Section 287(a) on all gaming apparatus manufactured and sold by them under said Letters Patent 3,659,284 and 3,659,285 and have given written notice

to defendants Seeburg Industries, Inc., The Seeburg Corporation of Delaware, and Williams Electronics, Inc. of said infringements of Letters Patent 3,659,284 and 3,659,285.

WHEREFORE, plaintiffs demand:

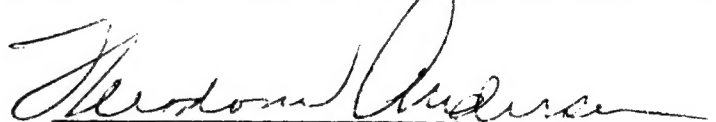
a preliminary and final injunction against continued infringement of said Letters Patent 3,659,284 and 3,659,285 by each of defendants,

an accounting of the damages to plaintiffs and the profits to defendants caused by said infringements,

an assessment of three times the damages and profits so determined,

an award of reasonable attorney fees, and

an assessment of interest and costs against defendants.



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